

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

\$61,903 IN U.S. CURRENCY,

Defendant,

and

ASHLEY ANGELICE CLARK,

Claimant.

Case No. 22-mc-\_\_\_\_\_

**STIPULATION TO EXTEND  
TIME TO COMMENCE  
JUDICIAL FORFEITURE  
PROCEEDINGS**

The Plaintiff and the Claimant stipulate, pursuant to 18 U.S.C. § 983(a)(3)(A), to extend the time in which the Plaintiff is required to file a Complaint for Forfeiture or to obtain an Indictment alleging forfeiture until January 09, 2023.

1. On or about November 01, 2019, St. Paul, Minnesota police officers, as part of a joint investigation with Homeland Security Investigations (HSI), seized \$61,903 in U.S. Currency from John Sheldon Pickens, Jr. while executing a search warrant on the residence he shared with Ashley Angelice Clark.

2. HSI commenced administrative forfeiture proceedings for the Defendant Currency and sent written notice to all known interested parties of its intent to forfeit the currency.

3. On June 06, 2022, Ashley Angelice Clark filed a claim for the Defendant Currency through her attorney at Kowitz Law.

4. The time has expired for any other person to file a claim for the Defendant Currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no other claims for any portion of the currency have been received from any other individual or entity.

5. Under 18 U.S.C. § 983(a)(3)(A), the government has 90 days after a claim has been filed in an administrative action to bring a civil complaint for forfeiture, “except that a court in the district in which the complaint will be filed may extend the period for filing a complaint for good cause shown or upon agreement of the parties.”

*[intentionally left blank]*

6. The parties agree to extend the deadline under 18 U.S.C. § 983(a)(3) for filing a judicial forfeiture proceeding with respect to the Defendant Currency until January 09, 2023 in order to allow time for settlement discussions.

Dated: August 25, 2022

ANDREW M. LUGER  
United States Attorney

*s/ Craig Baune*

BY: CRAIG BAUNE  
Assistant U.S. Attorney  
Attorney ID No. 331727  
600 United States Courthouse  
300 South Fourth Street  
Minneapolis, MN 55415  
Phone: 612-664-5600  
Craig.baune@usdoj.gov

Date: 08/24/2022

KOWITZ LAW

*s/ Travis Kowitz*

---

TRAVIS KOWITZ, Esq.  
Attorney ID No. 0399560  
PO BOX 598  
Lindstrom, MN 55045  
612-412-1679  
travis@kowitzlaw.com

Attorney for Claimant  
ASHLEY ANGELICE CLARK